

REMARKS

The office action of December 19, 2002, has been reviewed and its contents carefully noted. Reconsideration of this case, as amended, is requested. Claims 1, 3 and 5 through 14 remain in this case, claims 2 and 4 being cancelled and claims 13 and 14 being added by this response.

Preliminary Comments

The numbered paragraphs below correspond to the numbered paragraphs in the Office Action.

The claims were amended as follows. No new matter was introduced. Specifically:

- a. Independent Claims 1 and 8 were amended to more accurately define the method of the invention. The claims were amended as follows:
 - i. Original steps 1(a) and 8(a)(i) were deleted as unnecessary. The products are defined in the preamble as having features, so it is not necessary to develop them.
 - ii. Original steps 1(c) and 1(e) are combined into the preamble of claim 1, and steps 8(a)(iii) and 8(a)(v) are combined into step 8(a).
 - iii. Original step 1(b) is deleted, and the text of the step has become new dependent claim 13.
 - iv. Original step 8(a)(ii) is deleted, and the text of the step has become new dependent claim 14.
 - v. The remaining steps in claim 1 and claim 8(a) are lettered sequentially as 1(a) and 1(b), and steps 8(a)(i) and 8(a)(ii).
 - vi. In claim 1, step 1(c) is added to complete the novel method of the invention. In claim 8, step 8(a)(iii) corresponding to the first part of 1(c) is added, and step 8(d) is amended to incorporate the rest of step 1(c). The text of the new steps appears in the specification as filed, page 4, lines 4-6, and does not constitute new matter.

- b. Claims 2 and 4 have been cancelled as not necessary.
- c. Claim 7 is amended to change the dependency to claim 6, thus providing antecedent basis for the material in claim 7.
- d. Claims 1, 3, 5 and 8 are amended to make consistent the terminology feature text snippets and user profile text snippets.
- e. Claim 7 is amended to incorporate the text of new step 1(c).

Rejection(s) under 35 U.S.C. §103

- 3. Claims 1-12 were rejected under 35 U.S.C. 103(a) as being unpatentable over Shaya et al., US# 2002/0161664 A1, in view of Herz, US# 6,029,195.

As described above, independent claims 1 and 8 have been amended to better define the novel method of the invention. With the amendments to independent claims 1 and 8, Applicants believe the claims, as amended, are patentable over Shaya and Herz, individually and in combination.

The novel method of Applicants' invention is a natural language product recommendation system which combines generic phrases with feature text snippets for individual features and user profile text snippets for user profiles to generate a display comprising a comparison guide for the products featuring dynamically generated fluent text that is used to convey product analyses and recommendations tailored to the user requirements and preferences. Neither Shaya nor Herz, nor the combination of the references, teaches or suggests this method.

The Shaya application details a method of generating product recommendations using a neural network to determine its recommendations. In contrast to the Applicants' invention, in the Shaya method there are no generic phrases, no feature text snippets, no user text snippets, and no dynamically generated fluent text used to convey product analyses and recommendations tailored to the user requirements and preferences. Instead, Shaya presents its recommendations in tabular form - see figures 8a-b and 9a-b. In paragraph 112, Shaya says, "Another form of ancillary information output comprises explanations of why certain products were recommended. For

example, performance prediction metrics may be explained by querying the invention with a radio button or other appropriate interface and the invention could respond by providing a table of concern areas ordered by the consumer's importance and/or performance scores for the particular product being considered for each area of concern." In other words, the output of the system is tabular, not natural language.

Herz presents a method of tracking user selections from lists, and refining the lists presented to the user in response to user interest profiles. As in Shaya, Herz's main objective is the method of selection of data, not the method of presentation. There are no generic phrases, no feature text snippets, no user profile text snippets, and no dynamically generated fluent text used to convey product analyses and recommendations tailored to the user requirements and preferences.

If neither reference teaches or suggests the method of Applicants' invention, the combination of the two cannot make it obvious. The combination of Shaya and Herz would result in a product recommendation system using a neural network to provide a tabular list of selections (Shaya), and using the user's choices from the tabular list to refine the choices (Herz). In neither case would the combination teach or suggest Applicant's use of natural language to recommend products in a fluent, colloquial manner - the combination of Shaya and Herz would have no generic phrases, no feature text snippets, no user profile text snippets, and no dynamically generated fluent text used to convey product analyses and recommendations tailored to the user requirements and preferences.

Reconsideration and withdrawal of the rejection are respectfully requested.


Conclusion

Applicant believes the claims, as amended, are patentable over the prior art, and that this case is now in condition for allowance of all claims therein. Such action is thus respectfully requested. If the Examiner disagrees, or believes for any other reason that direct contact with Applicants' attorney would advance the prosecution of the case to finality, he is invited to telephone the undersigned at the number given below.

"Recognizing that Internet communications are not secured, I hereby authorize the PTO to communicate with me concerning any subject matter of this application by electronic mail. I understand that a copy of these communications will be made of record in the application file."

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